

1 JONATHAN W. CARLSON, ESQ.
 Nevada Bar No. 10536
 2 *jcarlson@mbswc.com*
 PAMELA L. MCGAHA, ESQ.
 3 Nevada Bar No. 8181
pmcgaha@mbswc.com
 4 MANDY VOGEL, ESQ.
 Nevada Bar No. 16150
 5 *mvozel@mbswc.com*
 McCORMICK, BARSTOW, SHEPPARD,
 6 WAYTE & CARRUTH LLP
 8337 West Sunset Road, Suite 350
 7 Las Vegas, NV 89113
 Telephone: (702) 949-1100
 8 Facsimile: (702) 949-1101
 9 CARY B. LERMAN, ESQ.
 California Bar No. 54937 (*admitted pro hac vice*)
 10 *cary.lerman@mto.com*
 MUNGER, TOLLES & OLSON LLP
 11 350 South Grand Ave, 50th Floor
 Los Angeles, CA 90071
 12 Telephone: (213) 683-9100
 13 J. MAX ROSEN, ESQ.
 California Bar No. 310789 (*admitted pro hac vice*)
 14 *max.rosen@mto.com*
 MUNGER, TOLLES & OLSON LLP
 15 560 Mission Street, 27th Floor
 San Francisco, CA 94105
 16 Telephone: (415) 512-4000
 Attorneys for Defendant GEICO CHOICE
 17 INSURANCE COMPANY

18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 WILLIE WORTHAMS, individually,

Case No. 2:24-cv-00023-JCM-NJK

21 Plaintiff,

**STIPULATION TO EXTEND TIME TO
FILE RESPONSES TO PLAINTIFF'S
MOTION FOR PROTECTIVE ORDER
[DOC. 91] AND MOTION TO COMPEL
[DOC. 92]**

22 v.

[FIRST REQUEST]

23 GEICO CHOICE INSURANCE COMPANY,
 a foreign entity; LEWIS BRISBOIS
 24 BISGAARD & SMITH, LLP, a foreign
 limited liability partnership; LEWIS ROCA
 ROTHGERBER, CHRISTIE, LLP, a foreign
 25 limited liability partnership; DOES I through
 X, inclusive; and ROE CORPORATIONS I
 26 through V, inclusive,

27 Defendants.

28

Case No. 2:24-cv-00023-JCM-NJK

STIPULATION TO EXTEND TIME TO FILE RESPONSES TO PLAINTIFF'S MOTION FOR PROTECTIVE
 ORDER [DOC. 91] AND MOTION TO COMPEL [DOC. 92]
 [FIRST REQUEST]

1 Pursuant to LR IA 6-1, Plaintiff Willie Worthams and Defendant GEICO Choice Insurance
 2 Company (“GEICO”), by and through their counsel of record, hereby submit to this Honorable
 3 Court this stipulation and request to extend the time by **seven (7) days** for GEICO to file responses
 4 to Plaintiff’s Motion for Protective Order against Defendant GEICO Choice Insurance Company’s
 5 Notices to take Depositions of Jerome “Jerry” J. Konell, Sharitheia Everett, and Willie Worthams
 6 [Doc. 91] (filed on December 11, 2024) and Plaintiff’s Motion to Compel Responses to Specific
 7 FRCP 34 Request for Production and Disclosure of Documents Claimed Privileged from FRCP 26
 8 Disclosures [Doc. 92] (filed on December 11, 2024). The current due date for GEICO’s responses
 9 to both motions is December 26, 2025, the day after Christmas. The proposed new due date is
 10 January 2, 2025.

11 The parties respectfully submit that good cause exists for this stipulation based on the
 12 following:

13 1. Counsel for GEICO has pre-planned Holiday travel that overlaps with the current
 14 schedule of the brief. The requested extension accommodates the Holidays, as well as those travel
 15 plans.

16 2. The Parties have agreed to stipulate to this extension.

17 3. This request is made in good faith and without intent to cause undue delay.

18 4. In accordance with LR IA 6-1, this is the first request for an extension of time to file
 19 oppositions to Plaintiff’s Motion for Protective Order against Defendant GEICO Choice Insurance
 20 Company’s Notices to take Depositions of Jerome “Jerry” J. Konell, Sharitheia Everett, and Willie
 21 Worthams [Doc. 91] and Plaintiff’s Motion to Compel Responses to Specific FRCP 34 Request for
 22 Production and Disclosure of Documents Claimed Privileged from FRCP 26 Disclosures [Doc. 92].

23 Dated: December 18, 2024

By: _____ /s/ Jonathan W. Carlson

24 MCCORMICK, BARSTOW, SHEPPARD,
 WAYTE & CARRUTH LLP

25 Jonathan W. Carlson, Nevada Bar No. 10536

26 Mandy Vogel, Nevada Bar No. 16150

27 Attorneys for Defendant
 GEICO Choice Insurance Company

28 ////

1 Dated: December 18, 2024

By: _____ /s/ Jerome R. Bowen

2 BOWEN LAW OFFICES

3 Jerome R. Bowen, Nevada Bar No. 4540

Attorneys for Plaintiff Willie Worthams

4

5 IT IS SO ORDERED that the deadlines to file Responses to Plaintiff's Motion for Protective

6 Order against Defendant GEICO Choice Insurance Company's Notices to take Depositions of

7 Jerome "Jerry" J. Konell, Sharithea Everett, and Willie Worthams [Doc. 91] and Plaintiff's Motion

8 to Compel Responses to Specific FRCP 34 Request for Production and Disclosure of Documents

9 Claimed Privileged from FRCP 26 Disclosures [Doc. 92] are extended up to and including January

10 2, 2025.

11

12 December 19, 2024



13 _____ UNITED STATES DISTRICT COURT JUDGE

14 10900188.1

15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of December, 2024, a true and correct copy of **STIPULATION TO EXTEND TIME TO FILE RESPONSES TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER [DOC. 91] AND MOTION TO COMPEL [DOC. 92] [FIRST REQUEST]** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Cheryl A. Schneider

Cheryl A. Schneider, an Employee of
McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP